

**IN THE UNITED STATES DISTRICT COURT FOR THE
MIDDLE DISTRICT OF PENNSYLVANIA**

THE PENNSYLVANIA STATE
UNIVERSITY,

Plaintiff,

v.

KEYSTONE ALTERNATIVES LLC,
d/b/a GoPSUrv.com; and MARK
LAUER,

Defendants.

Case No. 1:19-cv-02039-YK

**JOINT STIPULATION TO EXTEND DEADLINES FOR MOTIONS TO
EXCLUDE EXPERT OPINIONS PURSUANT TO *DAUBERT v. MERRELL
DOW PHARMACEUTICALS, INC.***

Plaintiff The Pennsylvania State University (“Penn State”) and Defendants Keystone Alternatives LLC and Mark Lauer (collectively, “Defendants”), by and through their undersigned counsel, hereby jointly stipulate to the extension of the deadline to file motions to exclude expert opinions and testimony pursuant to *Daubert v. Merrell Dow Pharmaceuticals, Inc.*, 509 U.S. 579 (1993). In support of this joint stipulation, the parties hereby state as follows:

1. The deadline for *Daubert* motions is currently October 15, 2021.
2. Penn State intends to file *Daubert* motions to exclude the opinions of Defendants’ two experts. Defendants do not intend to file any motions.
3. Under the current schedule, Defendants’ deadline to respond to Penn State’s *Daubert* motions is October 29, 2021.

4. Defendants' counsel has informed counsel for Penn State that Defendants' lead counsel has recently experienced health difficulties, the details of which Defendants will communicate to the Court by a separate filing.

5. Defendants' counsel has further informed Penn State's counsel that these health difficulties have required the hospitalization of Defendants' lead counsel, who has control of and access to a considerable amount of information related to this case.

6. To allow time for Defendants' counsel to prepare a response to Penn State's *Daubert* motions, or to otherwise evaluate the condition of Defendants' lead counsel, the parties have jointly agreed to a two-week extension of the deadline for the filing of *Daubert* motions, extending the deadline for such motions to October 29, 2021, and the deadline for Defendants' responses to November 12, 2021.

7. The stipulated extension will not affect the other deadlines established by the Court.

Dated: October 14, 2021

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system on this 14th day of October, 2021, which constitutes service on Defendants pursuant to Fed. R. Civ. P. 5(b)(2)(E):

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